

William Allen Newsom
S.B.I.# 257317
Delaware Correctional Center
1181 Paddock Road
Smyrna, Delaware 19977

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

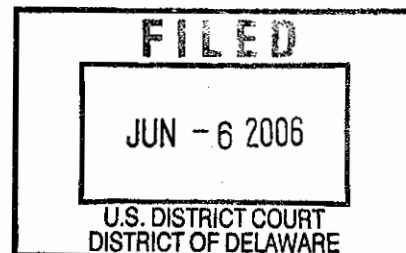
WILLIAM ALLEN NEWSOM,

PLAINTIFF,

vs.

COMMISSIONER STANLEY W. TAYLOR,
BUREAU CHIEF PAUL HOWARD, DEPUTY
WARDEN DAVID PIERCE, CAPTAIN SAGERS,
SECURITY SUPERINTENDENT CUNNINGHAM,
FIRST CORRECTIONAL MEDICAL, LLC,
DR. SITTA B. ALIE
DEFENDANTS.

CIVIL ACTION NO. 05-673-GMS



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PLAINTIFF'S FIRST REQUEST
FOR PRODUCTION OF DOCUMENTS

Pursuant to Rule 34 of the Federal Rules of Civil Procedure, Plaintiff hereby requests that Defendants produce for inspection and copying, the documents and tangible things identified below within thirty (30) calendar days of the service of this document request.

1. Any and all medical records and medical x-rays of Plaintiff's finger from September 25, 2003 through and including the date of your response to this request.
2. Any and all policies, procedures, regulations, instructions, notes, memoranda, internal communications, electronic messages and directives in effect from September 25, 2003 through and including the date of your response to this request concerning all defendants involved regarding the medical treatment for bone fracture and dislocation of plaintiff's finger at the Delaware Correctional Center at Smyrna, Delaware.
3. Any notes, documents, letters, memoranda, files, records, record books, logs, grievance reports or written communications concerning complaints made against Dr. Sitta B. Alie and FIRST CORRECTIONAL MEDICAL, LLC.
4. Any and all certificates, degrees, credentials, and licenses held by Dr. Sitta B. Alie that allowed her to practice medicine under her professional title of "doctor" at the Delaware Corr. Cntr. at Smyrna, Delaware.

5. Any and all documents, notes, memoranda, internal communications, electronic messages and directives that were issued from September 25, 2003 through and including the date of your response to this request concerning the termination of Dr. Sitta B. Alie's practice as Doctor within the Delaware Correctional Center at Smyrna, Delaware.
6. Any and all policies, procedures, regulations, instructions and directives in effect from September 25, 2003 through and including the date of your response to this request concerning the hiring practices of any and all staff members of FIRST CORRECTIONAL MEDICAL, LLC.
7. Any and all documents, agreements, regulations, policies, procedures and contracts from September 25, 2003 through and including the date of your response to this request concerning the Department of Corrections contracting the services of FIRST CORRECTIONAL MEDICAL, LLC.
8. Any and all documents, letters, memoranda, internal messages, electronic messages, policies, procedures and regulations in effect from September 25, 2003 through and including the date of your response to this request concerning the Department of Corrections terminating its contract with FIRST CORRECTIONAL MEDICAL, LLC.

DATE: June 4, 2006

BY: William A. Newsom

WILLIAM ALLEN NEWSOM
S.B.I.# 257317
DELAWARE CORRECTIONAL CENTER
1181 PADDOCK ROAD
SMYRNA, DELAWARE 19977

I, WILLIAM A. NEWSOM, hereby certify that I have served a true and correct cop(ies) of the attached: MOTION FOR DISCOVERY AND MOTION FOR APPOINTMENT OF COUNSEL upon the following parties/person (s):

TO: ATTORNEY GENERAL
STATE OF DELAWARE
820 N. FRENCH ST.
WILMINGTON, DELAWARE
19801

TO: _____

TO: OFFICE OF THE CLERK
UNITED STATES DISTRICT COURT
844 N. KING ST., LOCKBOX 18
WILMINGTON, DELAWARE
19801

TO: _____

BY PLACING SAME IN A SEALED ENVELOPE and depositing same in the United States Mail at the Delaware Correctional Center, 1181 Paddock Road, Smyrna, DE 19977.

On this 4TH day of JUNE, 2006

William A. Newsom

WM WILLIAM A. NEWSOM

SBI# 257317 UNIT V-BDG./C-2

DELAWARE CORRECTIONAL CENTER

1181 PADDOCK ROAD

SMYRNA, DELAWARE 19787

EX-107
FBI
GMS



OFFICE OF THE CLERK
UNITED STATES DISTRICT COURT
844 N. KING ST., LOCKBOX 18
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